

**LEWIS TOWERS, INC.**  
**CERTIFICATION OF CPNI FILING**  
**FEBRUARY 6, 2006**  
**EB-06-TC-060; EB-06-36**

Pursuant to 47 C.F.R. § 64.2009(e), I, Lewis Heaster, President of Lewis Towers, Inc. ("Lewis Towers"), hereby certify that I have personal knowledge that Lewis Towers has established operating procedures that are adequate to ensure compliance with the FCC's rules governing use of Customer Proprietary Network Information.

  
Lewis Heaster

February 6, 2006

**LEWIS TOWERS, INC.**  
**CUSTOMER PROPRIETARY NETWORK INFORMATION ("CPNI")**  
**COMPLIANCE POLICY**

Lewis Towers, Inc. ("Lewis Towers") is a wireless telecommunications carrier that offers non-interconnected, two-way radio, push-to-talk service only to its customers. Given the nature of its operations and its system's capabilities, Lewis Towers does not maintain any CPNI, as defined 47 C.F.R. § 64.2003(d) and 47 U.S.C. 222(h)(1). Lewis Towers is therefore not capable of divulging such data to third parties, and need not implement the safeguards described in 47 C.F.R. § 64.2009.